

LATHAM & WATKINS LLP  
Christopher S. Yates (Cal. Bar No. 161273)  
*chris.yates@lw.com*  
Belinda S Lee (Cal. Bar No. 199635)  
*belinda.lee@lw.com*  
Aaron T. Chiu (Cal. Bar No. 287788)  
*aaron.chiu@lw.com*  
505 Montgomery Street, Suite 2000  
San Francisco, California 94111-6538  
Telephone: +1.415.391.0600

LATHAM & WATKINS LLP  
Sean M. Berkowitz (*pro hac vice*)  
*sean.berkowitz@lw.com*  
330 North Wabash Avenue, Suite 2800  
Chicago, Illinois 60611  
Telephone: +1.312.876.7700

*Attorneys for Defendants Broadcom Inc., Broadcom  
Corporation and Avago Technologies International  
Sales Pte. Limited*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SAMSUNG ELECTRONICS CO., LTD.

Plaintiff,

v.

BROADCOM INC., BROADCOM  
CORPORATION, AND AVAGO  
TECHNOLOGIES INTERNATIONAL  
SALES PTE. LIMITED,

Defendants.

CASE NO. 3:24-cv-03959-LB

**DECLARATION OF AARON T. CHIU  
IN SUPPORT OF DEFENDANTS'  
NOTICE OF MOTION AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
MOTION TO DISMISS**

Date: December 5, 2024  
Time: 9:30 a.m.  
Courtroom: Courtroom B, 15<sup>th</sup> Floor  
Before: Hon. Laurel Beeler

1 I, Aaron T. Chiu, declare as follows:

2 1. I am a partner at the law firm of Latham & Watkins LLP, counsel to Defendants  
3 Broadcom Inc., Broadcom Corporation, and Avago Technologies International Sales Pte. Limited  
4 (collectively "Broadcom"). I am a member in good standing with the State Bar of California, and  
5 I am admitted to practice before this Court. I have personal knowledge of the facts set forth in this  
6 declaration, and if called as a witness, could and would testify competently thereto. I make this  
7 declaration in support of Broadcom's Notice of Motion and Motion to Dismiss the Complaint.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Strategic Agreement  
9 entered into by and between Samsung Electronics Co., Ltd., and Broadcom, which is incorporated  
10 by reference in the Complaint (ECF No. 1) at ¶¶ 7–9, 19, 20, 22, 76, 77, 79–81, 85, 88–91, 98, 111,  
11 122, 149, 160.

12 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Termination  
13 Agreement entered into between Samsung Electronics Co., Ltd and Broadcom, which is  
14 incorporate by reference in the Complaint (ECF No. 1) at ¶ 90.

15 I declare under penalty of perjury that the foregoing is true and correct and that this  
16 declaration was executed on August 28, 2024, in San Rafael, California.

17  
18 Dated: August 28, 2024

Respectfully submitted,

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21 Aaron T. Chiu  
22 LATHAM & WATKINS LLP  
23 *Attorneys for Defendants Broadcom Inc., Broadcom*  
24 *Corporation and Avago Technologies International*  
25 *Sales Pte. Limited*  
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